Carl Arnold

156 Prospect Park West Brooklyn, NY 11215 1 2 7 6 '99 MAY 21 A10:28 718/788-5944 (t + f) lizacarl@erols.com

May 13. 1999

Re: Docket #98N-1038 "Irradiation in the production, processing, and handling of food."

To whom it may concern:

I support the recommendation by the Center for Science in the Public Interest on the labeling of irradiated foods.

There is a tradition in the US of informing its citizens so they can make reasoned choices, and the FDA requires its labeling to be truthful, not misleading. Both the tradition and the FDA requirement are threatened by what the FDA proposes. The public should therefore have ample time to respond to the question of labeling of irradiated foods. Several other points are central to this issue:

- Using the word *pasteurization* rather than the phrases *treated with radiation* or *treated by irradiation* is stunningly misleading for reasons too obvious to explain.
- Requiring full irradiation disclosure (both label and radura) should <u>not</u> expire at any time. It is
 essential that the symbol and label be understandable at the point of purchase for everyone.
 With no label, consumers will be <u>misled</u> into believing the food has not been irradiated.
- The wording of the Center for Science in the Public Interest is excellent and should guide the FDA in its final determination: "any foods treated by irradiation, or any foods containing ingredients that have been treated by irradiation, should be labeled with a written statement on the principal display panel indicating such treatment. The statement should be easy to read and placed in close proximity to the name of the food and accompanied by the international symbol. If the food is unpackaged, this information should be clearly displayed on a poster in plain view and adjacent to where the product is displayed for sale."

I urge you to extend the comment period past its current end date of May 18, 1999 to allow more concerned citizens to write in about this crucial democratic issue. Also, please place the comments received on the Internet so that the public can be fully informed about who is participating in this comment process and what they are saying.

Carl B. Arnold

CARL ARNOLD 156 PROSPECT PARK W BROOKLYN, NY 11215





Dockets Mgt Branch (HFA-305) Food and Drug Administration 5630 Fishers Leve, Room 1061 Rockville MD, 20852

20857/0001 Inidilladalahdalladalahdalladalahdalladal